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Counsel for the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

CORSICANA BEDDING, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 22-90016-ELM-11

Jointly Administered

**SUPPLEMENT TO FIRST AND FINAL APPLICATION OF PACHULSKI STANG
ZIEHL & JONES LLP, AS COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR SERVICES RENDERED DURING
THE PERIOD FROM JULY 11, 2022 THROUGH DECEMBER 19, 2022**

Name of Applicant:	<u>Pachulski Stang Ziehl & Jones LLP</u>
Role in Case:	<u>Counsel to Official Committee of Creditors</u>
Petition Date:	<u>June 25, 2022</u>
Retention Date:	<u>July 11, 2022 [Docket No. 386]</u>

Summary of Supplemental Compensation

Amount Requested:		Reductions:	
Fees:	\$20,828.00	Voluntary fee reductions:	N/A
Expenses:	\$ 7.30	Expense reductions:	N/A
Other:	N/A		
Total Requested:	\$20,835.30	Total Reductions:	N/A

Draw Down Request:		Expense Detail:	
Retainer received:	N/A	Reproduction / Scan Copy	\$7.30
Previous Draw Down(s):	N/A		
Remaining Retainer (now):	N/A		
Requested Draw Down:	N/A		
Retainer Remaining (after):	N/A		
Total Draw Down Request	N/A	Total Expense	\$7.30

Hourly Rates (Supplemental Fee Period)	Attorney	Paralegal/Clerical
Highest Billed Rate:	\$1,445.00	\$495.00
Total Hours Billed:	9.60	18.80
Blended Rate:	\$1,210.63	\$489.68

Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), and the *Order Granting Debtors’ Motion Establish Procedures for Interim Compensation and Reimbursement of Expenses For Case Professionals* [Docket No. 281] entered by the Court on August 9, 2022 (the “Compensation Order”), Pachulski Stang Ziehl & Jones LLP (“PSZJ”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits this supplement (the “Supplement”) to the *First and Final Application of Pachulski Stang Ziehl & Jones LLP, as Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for Services Rendered During the Period from July 11, 2022 Through December 19, 2022* [Docket No. 509] (the “Final Fee Application”), filed on November 24, 2022, for the supplemental period from November 1, 2022 through December 19, 2022 (the “Supplemental Period”).

Pursuant to the Final Fee Application, PSZJ reserved the right to file supplemental fee application(s) to include additional fees and expenses not previously included.

By this Supplement, PSZJ seeks to incorporate into the Final Fee Application the additional fees in the amount of \$20,828.00 and expenses in the amount of \$7.30, for the supplemental fee period of November 1, 2022, through December 19, 2022. A summary of the supplemental fees and expenses, broken down by category, is attached hereto as **Exhibit A**. Detailed itemization of the services rendered during the Supplemental Period is set forth on **Exhibit B**, attached hereto.

WHEREFORE, PSZ&J respectfully requests the Court:

(a) approve final allowance of supplemental fees in the amount of \$20,828.00 for professional services rendered to the Committee since the filing of the Final Fee Application and \$7.30 in out-of-pocket expenses incurred in connection with the rendering of such services during the period from November 1, 2022 through November 30, 2022;

(b) approve final allowance of \$722,586.00 for professional services rendered to the Committee and \$1,082.91 in out-of-pocket expenses incurred in connection with the rendering of such services during the period from July 11, 2022 through and including December 19, 2022; and

(c) authorize and direct the Debtors to immediately pay to the Firm a sum total of \$193,190.08, which amount represents the unpaid fees and expenses the Firm incurred during the Compensation Period.

Dated: December 9, 2022

Respectfully submitted,

/s/ Michael D. Warner

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-and-

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*Counsel to the Official Committee of
Unsecured Creditors*

EXHIBIT A

Summary of Hourly Fees and Expenses by Category
(November 1, 2022 – November 30, 2022)

Category	Fees
Case Administration	\$1,127.50
Claims Administration / Objection	\$1,341.50
Compensation of Professionals	\$10,970.50
Compensation of Professionals / Others	\$2,034.00
Executory Contracts	\$259.00
General Creditors' Committee	\$114.50
Hearing	\$916.00
Operations	\$4,065.00
Total Fees	\$20,828.00
Expenses	
Reproduction / Scan Copy	\$7.30.
Grand Total	\$20,835.30

EXHIBIT B

Pachulski Stang Ziehl & Jones LLP

919 North Market Street
17th Floor
Wilmington, DE 19801

December 06, 2022

Invoice 131348

Client 15806

Matter 00002

BJS

BJS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/06/2022

FEES \$20,828.00

EXPENSES \$7.30

TOTAL CURRENT CHARGES **\$20,835.30**

BALANCE FORWARD **\$172,354.78**

TOTAL BALANCE DUE **\$193,190.08**

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Page: 2
Invoice 131348
December 06, 2022

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BJS	Sandler, Bradford J.	Partner	1445.00	3.70	\$5,346.50
BLW	Wallen , Ben L	Associate	825.00	1.50	\$1,237.50
DLM	Mendoza, Denise L.	Other	395.00	1.00	\$395.00
KLL	LaBrada, Kerri L.	Paralegal	495.00	2.70	\$1,336.50
PJJ	Jeffries, Patricia J.	Paralegal	495.00	15.10	\$7,474.50
SSC	Cho, Shirley S.	Partner	1145.00	4.40	\$5,038.00
				<hr/> 28.40	<hr/> \$20,828.00

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Page: 3
Invoice 131348
December 06, 2022

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
CA	Case Administration [B110]	1.50	\$1,127.50
CO	Claims Admin/Objections[B310]	1.10	\$1,341.50
CP	Compensation Prof. [B160]	19.10	\$10,970.50
CPO	Comp. of Prof./Others	2.60	\$2,034.00
EC	Executory Contracts [B185]	0.20	\$259.00
GC	General Creditors Comm. [B150]	0.10	\$114.50
HE	Hearing	0.80	\$916.00
OP	Operations [B210]	3.00	\$4,065.00
		28.40	<hr/> \$20,828.00

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Page: 4
Invoice 131348
December 06, 2022

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Reproduction/ Scan Copy	\$7.30
	<hr/> \$7.30

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15806 -00002

Page: 5
Invoice 131348
December 06, 2022

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Case Administration [B110]						
11/04/2022	BJS	CA	Review critical dates and discuss with KL	0.10	1445.00	\$144.50
11/04/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
11/10/2022	BJS	CA	Review critical dates and discuss with KL	0.10	1445.00	\$144.50
11/16/2022	SSC	CA	Review and respond to B. Best regarding case status.	0.10	1145.00	\$114.50
11/16/2022	SSC	CA	Review and respond to S. Pezanowksy regarding case status.	0.10	1145.00	\$114.50
11/16/2022	SSC	CA	Correspond with M. Greenberg regarding case status.	0.10	1145.00	\$114.50
11/16/2022	KLL	CA	Correspond with S. Cho on December hearing date.	0.20	495.00	\$99.00
11/21/2022	KLL	CA	Update critical dates memo.	0.20	495.00	\$99.00
11/29/2022	KLL	CA	Update critical dates memo.	0.30	495.00	\$148.50
				1.50		\$1,127.50
Claims Admin/Objections[B310]						
11/15/2022	BJS	CO	Attention to 503b9 claims	0.10	1445.00	\$144.50
11/18/2022	BJS	CO	Attention to 503b9 claims, omnibus hearing	0.30	1445.00	\$433.50
11/21/2022	BJS	CO	Various emails with UCC regarding 503b9, MTD	0.20	1445.00	\$289.00
11/21/2022	BLW	CO	Attend hearing re: 503(b)(9) claim objection and sixth motion to reject.	0.40	825.00	\$330.00
11/22/2022	BJS	CO	Review Schneider stipulation	0.10	1445.00	\$144.50
				1.10		\$1,341.50
Compensation Prof. [B160]						
11/10/2022	BLW	CP	Correspond re: A&M Monthly statement and review same.	0.10	825.00	\$82.50
11/14/2022	SSC	CP	Review PSZJ October fee statement.	0.10	1145.00	\$114.50
11/17/2022	PJJ	CP	Draft October fee statement.	0.80	495.00	\$396.00
11/17/2022	SSC	CP	Review October PSZJ fee statement.	0.10	1145.00	\$114.50
11/17/2022	KLL	CP	Finalize and serve PSZJ October monthly fee statement.	0.30	495.00	\$148.50

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Page: 6
Invoice 131348
December 06, 2022

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/18/2022	PJJ	CP	Draft final fee application.	3.00	495.00	\$1,485.00
11/20/2022	PJJ	CP	Work on final fee application.	2.40	495.00	\$1,188.00
11/21/2022	PJJ	CP	Work on final fee application.	2.00	495.00	\$990.00
11/21/2022	SSC	CP	Review and revise final fee application.	0.70	1145.00	\$801.50
11/21/2022	SSC	CP	Correspond with Bradford J. Sandler regarding PSZJ final fee application filing.	0.10	1145.00	\$114.50
11/21/2022	KLL	CP	Review and provide comments to PSZJ final fee application.	0.40	495.00	\$198.00
11/21/2022	BJS	CP	Review and Revise final fee application	0.40	1445.00	\$578.00
11/22/2022	PJJ	CP	Emails regarding final fee applications (.2); telephone conference with B. Wallen regarding same (.1).	0.30	495.00	\$148.50
11/22/2022	PJJ	CP	Review A&M final fee application and prepare for filing.	0.80	495.00	\$396.00
11/22/2022	SSC	CP	Correspond with Patricia Jeffries regarding PSZJ fee application revisions.	0.20	1145.00	\$229.00
11/23/2022	PJJ	CP	Revise final fee application (1.8) and prepare for filing (.4).	2.20	495.00	\$1,089.00
11/23/2022	PJJ	CP	Revise A&M final fee application and prepare for filing.	0.40	495.00	\$198.00
11/23/2022	SSC	CP	Telephone conference with Patricia Jeffries regarding final fee application for filing.	0.10	1145.00	\$114.50
11/23/2022	DLM	CP	Review, finalize and file PSZJ Final Fee Application.	0.30	395.00	\$118.50
11/26/2022	SSC	CP	Review and respond to Patricia Jeffries regarding final fee application.	0.10	1145.00	\$114.50
11/28/2022	PJJ	CP	Prepare notice of hearing for PSZJ and A&M final fee applications.	0.40	495.00	\$198.00
11/28/2022	PJJ	CP	Prepare certificate of service regarding notice of hearing.	2.30	495.00	\$1,138.50
11/28/2022	SSC	CP	Review and respond to Haynes & Boone regarding final fee application.	0.10	1145.00	\$114.50
11/28/2022	BLW	CP	Revise and coordinate filing COS and NOH re: PSZJ and A&M Final Fee Applications.	0.60	825.00	\$495.00

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Corsicana Bedding O.C.C.
15806 -00002

Page: 7
Invoice 131348
December 06, 2022

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/28/2022	DLM	CP	Review, finalize and file Notice of Hearing and Certificate of Service re Fee Applications of PSZJ and A&M.	0.40	395.00	\$158.00
11/30/2022	PJJ	CP	Draft supplement to final fee application.	0.50	495.00	\$247.50
				19.10		\$10,970.50

Comp. of Prof./Others

11/10/2022	SSC	CPO	Review A&M October fee statement.	0.10	1145.00	\$114.50
11/10/2022	SSC	CPO	Review several emails from J. Greenberg, Kerri LaBrada, Benjamin L. Wallen regarding A&M October fee statement.	0.10	1145.00	\$114.50
11/10/2022	BJS	CPO	Review A&M Fee Application	0.10	1445.00	\$144.50
11/10/2022	KLL	CPO	Review and serve Alvarez & Marsal October monthly fee statement.	0.40	495.00	\$198.00
11/16/2022	SSC	CPO	Review and respond to B. Desai regarding A&M fee application.	0.10	1145.00	\$114.50
11/17/2022	KLL	CPO	Review correspondence from Alvarez & Marsal and circulate forms of final fee applications and procedures to same.	0.40	495.00	\$198.00
11/18/2022	SSC	CPO	Review and respond to B. Desal regarding final fee applications.	0.10	1145.00	\$114.50
11/18/2022	KLL	CPO	Correspond with Alvarez & Marsal on November fees and final fee application.	0.20	495.00	\$99.00
11/21/2022	SSC	CPO	Correspond with A&M regarding their final fee application.	0.10	1145.00	\$114.50
11/22/2022	SSC	CPO	Review A&M final fee application and correspond with B. Desal regarding same.	0.20	1145.00	\$229.00
11/22/2022	BLW	CPO	Review A&M final fee application.	0.40	825.00	\$330.00
11/23/2022	BJS	CPO	Review H&B fee application	0.10	1445.00	\$144.50
11/23/2022	DLM	CPO	Review, finalize and file Alvarez and Marsal Final Fee Application.	0.30	395.00	\$118.50
				2.60		\$2,034.00

Executory Contracts [B185]

11/30/2022	BJS	EC	Review Motion to assume	0.10	1445.00	\$144.50
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Page: 8
Invoice 131348
December 06, 2022

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/2022	SSC	EC	Review and respond to Haynes & Boone regarding expedited relief regarding rejection.	0.10	1145.00	\$114.50
				0.20		\$259.00
General Creditors Comm. [B150]						
11/21/2022	SSC	GC	Review Bradford J. Sandler update to Committee.	0.10	1145.00	\$114.50
				0.10		\$114.50
Hearing						
11/15/2022	SSC	HE	Correspond with Bradford J. Sandler regarding hearing.	0.10	1145.00	\$114.50
11/18/2022	SSC	HE	Correspond with Benjamin L. Wallen regarding hearing.	0.10	1145.00	\$114.50
11/18/2022	SSC	HE	Review hearing agenda.	0.10	1145.00	\$114.50
11/18/2022	SSC	HE	Telephone conference with Benjamin L. Wallen regarding hearing.	0.10	1145.00	\$114.50
11/21/2022	SSC	HE	Attend hearing telephonically.	0.40	1145.00	\$458.00
				0.80		\$916.00
Operations [B210]						
11/18/2022	SSC	OP	Review and revise motion to dismiss.	0.60	1145.00	\$687.00
11/18/2022	SSC	OP	Correspond with Haynes & Boone regarding motion to dismiss.	0.20	1145.00	\$229.00
11/18/2022	BJS	OP	Attention to dismissal	0.50	1445.00	\$722.50
11/18/2022	BJS	OP	Teleconference with SC regarding dismissal	0.10	1445.00	\$144.50
11/19/2022	BJS	OP	Attention to MTD	0.40	1445.00	\$578.00
11/21/2022	BJS	OP	Attention to MTD	0.30	1445.00	\$433.50
11/23/2022	BJS	OP	Review MOR	0.10	1445.00	\$144.50
11/23/2022	BJS	OP	Attention to MTD	0.40	1445.00	\$578.00
11/24/2022	BJS	OP	Review MTD	0.30	1445.00	\$433.50
11/25/2022	SSC	OP	Review motion to dismiss.	0.10	1145.00	\$114.50
				3.00		\$4,065.00

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Page: 9
Invoice 131348
December 06, 2022

TOTAL SERVICES FOR THIS MATTER:

\$20,828.00

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Page: 10
Invoice 131348
December 06, 2022

Expenses

11/23/2022	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
11/28/2022	RE2	SCAN/COPY (56 @0.10 PER PG)	5.60
11/28/2022	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
11/28/2022	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
Total Expenses for this Matter			\$7.30

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Page: 11
Invoice 131348
December 06, 2022

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 12/06/2022

Total Fees \$20,828.00

Total Expenses 7.30

Total Due on Current Invoice \$20,835.30

Outstanding Balance from prior invoices as of 12/06/2022 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
130547	07/31/2022	\$388,741.00	\$300.67	\$77,748.20
130759	08/31/2022	\$255,317.00	\$371.66	\$51,063.40
131000	09/30/2022	\$17,849.00	\$280.90	\$3,569.80
131222	10/31/2022	\$27,424.00	\$122.38	\$27,546.38
131266	10/31/2022	\$12,427.00	\$0.00	\$12,427.00

Total Amount Due on Current and Prior Invoices: \$193,190.08